



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1
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BOSTON, MASSACHUSETTS 02114-2023

N62661 AR 001937
NAVSTA NEWPORT RI
5090 3a

June 30, 2005

Curtis Frye, Remedial Project Manager
U.S. Department of the Navy
Naval Facilities Engineering Command
Northern Division
10 Industrial Highway
Code 1823, Mail Stop 82
Lester, PA 19113-2090

Re: Final Closeout Report for Sand Blast Grit Removal at Derecktor Shipyard

Dear Mr. Frye:

EPA reviewed the *Final Closeout Report Sand Blast Grit Removal at Derecktor Shipyard, Naval Station Newport Portsmouth, Rhode Island* dated June 17, 2005 in light of the completeness of the investigation/report, consistency of the interpretations with the data, and the appropriateness of the recommendations in light of the results. This report documents the results of a removal action at the location of the new north gate and security improvements military construction project. Detailed comments are provided in Attachment A.

It may be premature to issue a final closeout report for this removal activity given that identified sand blast grit was left in place. The report documents that the eastern sidewall of the excavation was visually observed to contain sand blast grit. It further states that plastic sheeting was left in the excavation to demarcate the clean area from this remaining contamination. Will a separate removal action and a separate close out report be issued for the remaining sand blast grit?

I look forward to working with you and the Rhode Island Department of Environmental Management toward the cleanup of Derecktor Shipyard. Please do not hesitate to contact me at (617) 918-1385 should you have any questions.

Sincerely,

Kimberlee Keckler, Remedial Project Manager
Federal Facilities Superfund Section

Attachment

cc: Paul Kulpa, RIDEM, Providence, RI
Cornelia Mueller, NETC, Newport, RI
Jennifer Stump, Gannet Fleming, Harrisburg, PA

ATTACHMENT A

<u>Page</u>	<u>Comment</u>
p. 2, §3.0	<p>A photograph accompanying this report depicts a liquid that is not identified or explained in the report. Weather records for Newport indicate that no precipitation was recorded on December 22, 2004. The liquid in the photograph indicates a possible release of liquids into the excavation on 12/22/04. Specifically, photograph "DATE 12/22/04 TIME:1511" shows what appears to be standing liquid in the excavation and possibly wet marks on the top of debris near (above and to the left of) the connection between the 16-inch metal pipe and the concrete chamber. Of the other photographs from that date, only the one labeled "DATE 12/22/04 TIME:1331" also shows what appears to be either standing water or another liquid. Pictures taken earlier that day appear to show a dry excavation. Please explain the presence of the liquid. Was there a release from the 16-inch metal pipe? If so, was the liquid sampled?</p>
p. 2, §3.0, ¶2	<p>The date of site activities should be specified and should agree with the dates on the photographs.</p>
Figure 3-1	<p>The item labeled "DRAIN PIPE" is out of scale, if this is the item labeled "16" METAL PIPE ENTERING CONCRETE CHAMBER W/PIPE" on the photograph labeled "DATE: 12/22/04 TIME:1511." The report should be consistent in labeling this feature.</p> <p>Please clarify if the "16" METAL PIPE ENTERING CONCRETE CHAMBER W/PIPE" on the photograph labeled "DATE: 12/22/04 TIME:1511" is depicted on the figure.</p> <p>The "POTENTIAL DRAINAGE PIPE ENTERING EXCAVATION" on the photograph labeled "DATE: 12/22/04 TIME: 1328" should be identified on the figure.</p> <p>The "8" CLAY PIPE ENTERING EXCAVATION AREA (SOUTH SIDE)" on the photograph labeled "DATE: 12/22/04 TIME: 1512" should be identified on the figure. This appears to be the same pipe that is the subject of the previous comment. Consistent labeling would be helpful.</p> <p>It would be beneficial if the location and orientation of the photographs were shown.</p> <p>A note labeling this figure as "Not to Scale" should be added unless the figure and features shown are to scale. If they are to scale, please add a graphical scale.</p>

p. 4, §4.0, ¶2 The date of site activities should be specified. This should agree with the dates on the photographs.

Appendix B On the three unnumbered tables, the meaning of the column labeled "Reporting Limit Issue (Y/N)?" and the laboratory qualifier "E" should be annotated with a footnote.

On the second unnumbered table, the laboratory qualifier for the mercury concentration in the "SHIPYARD-SIDEWALL4" sample is listed incorrectly as "B." It should be "U."

The laboratory reports for samples "L-SHIPYARD-BASE3A" and "L-SHIPYARD-BASE3A" are not provided.

Chain of custody documentation is not provided for the samples.